

EXHIBIT C

Plaintiffs' Requests for Production Obviated by
Withdrawal of 568 Exemption Defense
and
Currently Proposed Search Strings Associated with
Plaintiffs' Requests for Production Obviated by
Withdrawal of 568 Exemption Defense

Exhibit C.1 – Plaintiffs’ Requests for Production Obviated by Withdrawal of 568 Exemption Defense

RFP No.	RFP Text	Entirely/Partially Obviated by Withdrawal of 568 Exemption Defense
4	For each Financial Aid Applicant to Your full-time undergraduate program during the Relevant Time Period, all data and information contained in any (a) Financial Aid management software database or platform or (b) Admissions and Enrollment Management Software, database, or platform, with such data to be provided in the Electronic Format in which such data were received and/or subsequently stored if such data were imported or otherwise integrated into Your databases.	Partially - Subpart B
5	<p>To the extent not provided in response to one of the Requests above, for each Financial Aid Applicant to Your full-time undergraduate program during the Relevant Time Period, provided in the Electronic Format in which such data were received and/or subsequently stored if such data were imported or otherwise integrated into Your databases:</p> <ul style="list-style-type: none"> a. All Applicant ID numbers received, created, or otherwise used by Your institution; b. the Academic Year of the Financial Aid Applicant’s Financial Aid Application; c. the date of the Admissions application; d. the date of the Financial Aid Application; e. each Financial Aid Applicant’s identification number; f. if a Financial Aid Applicant is a returning Student, the Student identification number or other identification number(s) maintained, created, or used by Your institution; g. the Applicant’s full name; h. the Applicant’s age; i. the Applicant’s race; j. the Applicant’s ethnicity; k. the admittance status of the Applicant at Your institution and any other institution; l. any information Concerning the Financial Aid Applicant’s actual or potential Financial Aid, including whether the Applicant applied for Financial Aid; m. whether the Applicant applied for any Early Admissions Program, Regular Decision, as a Transfer, or was placed on a Waitlist; n. whether the Applicant had any family member who attended Your institution; o. whether any of the Applicant’s parents were or are faculty or otherwise employed at Your institution; p. whether the Applicant was considered eligible for any preferential admission on the basis of the Applicant’s lack of need for Financial Aid or because of the Applicant’s family’s capacity to make a substantial Donation; and q. any other data considered in connection with the Applicant’s application. 	Partially - Subparts M-P

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11	Documents sufficient to identify the number of Applicants placed on a Waitlist and the number of Students admitted off the Waitlist each Academic Year during the Relevant Time Period.	Entirely
12	For all Admitted Waitlist Applicants, Documents sufficient to identify the Admitted Waitlisted Applicant, whether the Admitted Waitlisted Applicant sought Financial Aid, and any Financial Aid Package offered to or awarded to the Admitted Applicant.	Entirely
13	Documents sufficient to identify the number of Transfer Applicants and Transfer Students each during the Relevant Time Period.	Entirely
14	For all Admitted Transfer Applicants, Admissions Documents sufficient to identify the Admitted Applicant and all Documents Concerning whether the Admitted Transfer Applicant sought Financial Aid and any Financial Aid Package offered to or awarded to the Admitted Transfer Applicant.	Entirely
20	Documents sufficient to show all Donations cumulatively valued at \$50,000 or more made by families of Admitted Applicants during the period five years prior to when the Admitted Applicants were admitted. For Admitted Applicants who matriculated, this Request also seeks all Documents Concerning Donations made by them, on their behalf, or by their families between the Students’ matriculation and the five years following their graduation.	Entirely
21	Documents sufficient to identify all members of Your Parent Leadership Council or any other of Your Donor groups or societies. Such Parent Leadership Councils and Donor groups or societies include but are not limited to the Caltech President’s Circle, Cornell Family Fellows, MIT Parent Leadership Circle, and Notre Dame Billiard Circle.	Entirely
22	With respect to the list of individuals in Appendix 1, all Documents in your Development Office or Admissions Office Concerning any actual or potential Donation to You by such individuals, as well as all Documents in your Development Office or Admissions Office Concerning any Applicants who are identified in any files, records, databases, or software used by your Development Office as children, relatives, or friends of such individuals.	Entirely
23	All Documents or database entries Concerning awareness by the Development Office of any Applicant at any time prior to that Applicant’s matriculation at Your institution.	Entirely

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RFP No.	RFP Text	Entirely/Partially Obviated by Withdrawal of 568 Exemption Defense
30	All Documents Concerning: a. how the 568 Group has defined the term “need-blind”; and b. how the 568 Group communicated requirements for 568 Group Members to be “need-blind” under its standards, including all memoranda of understanding and Certifications of Compliance; any auditing or similar efforts to ensure that 568 Group Members complied with the 568 Group’s “need-blind” standard; any Enforcement Mechanisms contemplated or action actually taken against members for failing to comply with the 568 Group’s “need-blind” standard; and any Documents Concerning the treatment of Waitlisted Applicants and Transfer Applicants with respect to being “need-blind” under the 568 Group’s standard.	Entirely
31	All Documents Concerning the 568 Group that also Concern the actual or potential preferential treatment of Applicants from families capable of making substantial Donations; any Documents Concerning actual or potential preferential treatment of Applicants who did not need Financial Aid; and any discussions of Enrollment Management, including any efforts, plans, or proposals to craft the composition of classes at 568 Group Member institutions to achieve revenue or other financial goals.	Entirely
35	All Documents Concerning Footnote 2 in the 2016 Memorandum of Understanding of the 568 Presidents’ Group, http://www.568group.org/home/sites/default/files/568_MOU_2016_Final.pdf , stating that “[a]n agreement reached with the U.S. Department of Justice in 1993 allows institutions to be need aware with admitted wait list student (sic) so long as they meet the full need of all Admitted Applicants,” including a signed or executed agreement, and any similar Documents Concerning the permissibility of admitting Waitlisted, transfer, and nontraditional Applicants on a Need-Aware basis under 568 Exemption.	Entirely
41	Documents sufficient to show Your organizational structure, including Your directors, officers, deans, and employees involved in, and Your departments, divisions, affiliates, or contractors engaged in (a) the Admission of undergraduate Students to Your institution, (b) the solicitation and management of Donations and gifts to Your institution or any of its subdivisions or component entities, (c) the development of budgets, and (d) institutional research and competitive analysis. This Request includes organizational charts and Documents sufficient to identify each employee or contractor with responsibilities for undergraduate Admissions, Enrollment Management, Development and Donor relations, alumni relations, finance and investments, the coordination of the Development office and the Admissions office, and institutional research.	Partially - Subparts A-B

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RFP No.	RFP Text	Entirely/Partially Obviated by Withdrawal of 568 Exemption Defense
43	All Documents Concerning Your communications with any 568 Group Member Concerning (a) Admission of Students, (b) cost of Tuition, (c) Financial Aid programs or packages, and (d) need-blind (however You define that term) Admissions practices and/or (e) the Consensus Methodology or implementation of the Consensus Methodology or similar Financial Aid formulae.	Partially - Subpart D
49	Documents, including any statements, summaries, forecasts, strategic plans, budgets, data, and analyses, sufficient to demonstrate, for each Academic Year during the Relevant Time Period, Your Tuition revenue, Financial Aid, Development efforts or income, endowment performance, and costs to establish and operate Your institution, including but not limited to fixed-costs, financing, upgrades, improvements, maintenance, utilities, and renovations.	Partially - As to Development
54	All Documents Concerning policies, practices, and procedures relating to applications to your undergraduate programs and for Financial Aid during the Relevant Time Period including but not limited to Common Application submissions, Coalition application submissions, QuestBridge application submissions, Posse application submissions, Your internal Admissions application submissions, FAFSA and SAR submissions, CSS Profile submissions, supplemental Financial Aid Application form submissions, Financial Aid Packages provided to all Admitted Applicants and Students, and any revisions to Financial Aid Packages.	Partially - As to Admissions Applications
55	Documents sufficient to show Your Admissions and Financial Aid policies, practices, and procedures for each Academic Year during the Relevant Time Period, including handbooks, manuals, training materials, and promotional materials.	Partially - As to Admissions
58	All Documents Concerning Dean’s Interest Lists, Z Lists, and Tagging protocols and any Documents reflecting that anyone in Your Admissions office or President’s Office, or deans’ offices viewed images of Applicants’ homes, considered Applicants’ family income or family wealth in any way, considered whether Applicants’ zip codes signified affluence, or considered whether the Applicants revealed in any way that they intended to apply for Financial Aid.	Entirely
60	All Documents Concerning Your discussions and communications with other 568 Group Members as to whether they were need-blind (however You define that term).	Entirely

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RFP No.	RFP Text	Entirely/Partially Obviated by Withdrawal of 568 Exemption Defense
61	All Documents Concerning differences in Your Financial Aid policies, practices, or procedures for Applicants and Admitted Applicants (a) in any Early Admissions programs; (b) in the Regular Decision program; (c) off the Waitlist; (d) as a Transfer Applicant; or (e) into any schools, colleges, or programs with unique Admissions processes, including but not limited to Columbia University’s School of General Studies, Oxford College at Emory University, the University of Pennsylvania School of Liberal and Professional Studies, the Brown University Resumed Undergraduate Education program, the Georgetown University School of Continuing Studies Bachelor’s Completion Program, the Duke University Continuing Studies program for degree-seeking candidates, and Yale University Eli Whitney Students Program.	Entirely
62	All Documents Concerning the Admissions and Financial Aid policies and practices, formal or informal, for programs targeted toward non-traditional, full-time degree-seeking undergraduate Applicants and Students, including those with breaks in their education, adult learners, and those with dependents. Such programs include but are not limited to the Columbia University School of General Studies, the University of Pennsylvania School of Liberal and Professional Studies, the Brown Resumed Undergraduate Education program, the Georgetown School of Continuing Studies Bachelor’s Completion Program, the Duke University Continuing Studies program for degree-seeking candidates, and Yale’s Eli Whitney program.	Partially - As to Admissions
63	All Documents Concerning any relationship between Early Admissions programs and Financial Aid.	Entirely
77	All Documents Concerning Your Enrollment Management, including analyses of the use of any Enrollment Management Software, Consultants, employees, analyses, data, or algorithms. This Request includes all Documents within Your Admissions Office Concerning Landscape. This Request also includes all Documents Concerning the roles of any administrator at Your institution whose title or job description includes the term “enrollment management.”	Entirely
78	All Documents Concerning the book entitled, “Handbook of Strategic Enrollment Management.” This Request includes all Documents Concerning any of the co-authors or editors of the book.	Entirely

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79	All Documents within Your Admissions Office referring to the “missing middle,” “barbell effect,” “middle income,” or “middle class.”	Entirely
80	All Documents Concerning actual or potential consideration of any Applicant’s Financial Circumstances, including all Documents Concerning whether an Applicant placed on the Dean’s Interest List or Z List prior to Your making a decision regarding whether to admit the Applicant and whether the Applicant was in fact actually accepted for Admission by You.	Entirely
84	All Documents Concerning Your policies with respect to Admissions or Financial Aid policies when or if Your Financial Aid budget has been exhausted or exceeded in any given admissions cycle.	Partially - As to Admissions
85	All Documents Concerning the article published on February 23, 2019 in the Providence Journal entitled “VIP Dinners Offer Peek at Culture of Privilege.” See Lucas Smolcic Larson et al., VIP Dinners Offer Peek at Culture of Privilege, PROVIDENCE J. (Feb. 23, 2019), https://www.providencejournal.com/story/news/education/2019/02/24/vip-dinners-offer-peek-at-culture-of-privilege-at-brown-university/5834510007/ .	Entirely
86	All Documents Concerning the April 9, 2019 public statement by Brown University President Christina Paxson, where she wrote: “Preferential treatment, real or suspected, for students based on wealth or privilege is corrosive to our community. We are looking carefully at all our practices across the University—from alumni and parent engagement, to residential life, to academic concerns, to student conduct—to make sure that favoritism has no influence on students’ experiences.”	Entirely
87	All Documents Concerning the April 20, 2017 Columbia Spectator article by Jessica Spitz, which describes Columbia’s School of General Studies’s “perennial lack of funds that has left it, in stark comparison with Columbia College, unable to provide need-blind financial aid for its students.” Jessica Spitz, At a Crossroads: The Future of GS, COLUMBIA SPECTATOR (Apr. 20, 2017), https://www.columbiaspectator.com/news/2017/04/20/at-a-crossroads-the-future-of-gs/ .	Entirely

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88	All Documents Concerning the November 14, 2017 Columbia Spectator article by Eli Lee entitled “Public Health Professor Lisa Rosen-Metsch Appointed Dean of General Studies” including the editor’s note issued on February 16, 2022 stating, in substance, that the article’s previous statement that General Studies Admissions are “need-aware” was in error. See Eli Lee, Public Health Professor Lisa Rosen-Metsch Appointed Dean of General Studies, COLUMBIA SPECTATOR (Nov. 14, 2017), https://www.columbiaspectator.com/news/2017/11/14/public-health-professor-lisa-rosen-metsch-appointed-dean-of-general-studies/ .	Entirely
94	All Documents Concerning the statement by Cornell’s former Dean of Admissions Maria Laskaris stating, “The ultra-rich have an additional advantage in their ability to donate large sums of money to universities, which can boost their kids’ chances of acceptance. . . . Colleges are always in fundraising mode.” See Jill Tucker, In the College Admissions Game, Even the Legal Kind, Money Has Always Mattered, S.F. CHRON. (Mar. 12, 2019), https://www.sfchronicle.com/bayarea/article/In-the-college-admissions-game-even-the-legal-13683518.php .	Entirely
97	All Documents Concerning the statement on the Dartblog that “[a]t Dartmouth, development officers meet with admissions staff to review a list created by the development office. Each year, up to 50 applicants may be considered through this special process, most of whom are admitted, accounting for 4-5% of Dartmouth student body.”	Entirely
98	All Documents Concerning work performed by Jeff Sassorossi, including any work he performed as Dartmouth’s “liaison between the Advancement (Alumni Relations and Development) and Admissions” relating to Admissions policies and to Admissions of specific Students.	Entirely
99	All Documents Concerning the book The Price of Admission, by Daniel Golden, including statements in the book from Duke’s then-President Richard Brodhead that “it would be naïve to say that a university should pay no attention to a family’s ability to help the university” and that a family’s ability to donate to Duke was a “plus factor” in Admissions and from Duke’s former Director of Undergraduate Admissions Jean Scott that “‘a couple hundred’ applicants a year received special attention as children of prospective donors.”	Entirely

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100	All Documents Concerning the statement by Duke President Richard Broadhead [sic] that “[i]t would be naïve to say that any university should pay no attention to a family’s ability to help the university” and that “[t]he question is how much, what is the weight we will give this?” Geoffrey Mock, Broadhead [sic] Discusses Early Admissions, Developmental Admits, DUKE TODAY (Sept. 22, 2006), https://today.duke.edu/2006/09/admit.html .	Entirely
101	All Documents Concerning Emory’s January 17, 2013 press release entitled “Commitment to Excellence Guides Financial Aid” that “due to the combination of internal and external financial pressures, Oxford College implemented a need-sensitive framework in admitting and shaping part of its freshman class.” See Beverly Clark, Commitment to Excellence Guides Financial Aid, EMORY NEWS CTR. (Jan. 17, 2013), https://news.emory.edu/stories/2013/01/er_financial_aid/campus.html .	Entirely
102	All Documents Concerning the statement by Georgetown’s Dean of Admissions Charles Deacon that “[o]n the fundraising side, we also have a small number of ‘development potential’ candidates. If Bill Gates wants his kid to come to Georgetown, we’d be more than happy to have him come and talk to us.” See Alvin P. Sanoff, Getting in to Top Schools, WASHINGTONIAN (Oct. 1, 2007), https://www.washingtonian.com/2007/10/01/getting-in-to-top-schools/ .	Entirely
107	All Documents Concerning the April 24, 2019 Daily Northwestern article entitled “Northwestern President Schapiro Says He Reads Applications of Some Legacy, Donor Students.” Alan Perez & Gabby Birenbaum, Northwestern President Schapiro Says He Reads Applications of Some Legacy, Donor Students, THE DAILY NORTHWESTERN (Apr. 24, 2019), https://dailynorthwestern.com/2019/04/24/campus/northwestern-president-schapiro-says-he-reads-applications-of-some-legacy-donor-students/ . This Request includes all Documents Concerning the related podcast of Northwestern alumnus Alan Perez on May 3, 2019.	Entirely

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108	All Documents Concerning Notre Dame’s Vice President for Undergraduate Enrollment Don Bishop’s statement that “[p]eople think they give a couple hundred thousand or a million, they’re big donors, that’s just no longer the case” but that a larger Donation “which could fund 10 to 15 scholarship kids for perpetuation—do you let their children have some special interest? Yes. But they still have to be quite good.” See Daniel Golden, Jared Kushner Isn’t Alone: Universities Still Give Rich and Connected Applicants a Leg Up, PROPUBLICA (Nov. 22, 2016), https://www.propublica.org/article/jared-kushner-isnt-alone-universities-give-rich-applicants-a-leg-up .	Entirely
109	All Documents Concerning Director of Undergraduate Admissions at Notre Dame Bob Mundy, who is described in his biographies at various alumni gatherings as “delivering a freshmen class of approximately 2,000 students while also satisfying the needs of various constituencies, i.e. . . . the Development Office, etc.”	Entirely
110	All Documents Concerning former University of Pennsylvania Admissions Officer Karen Crowley’s statement that “[i]t never hurts to remind schools [that] you will be a full-paying student . . . [because t]he rules even change at need-blind schools when it comes to the waitlist. It’s not an official practice, but Admissions officers are human. They know endowments are down and cost-cutting is essential. If a full-paying student says he’ll definitely come, letting him in can be a relief.” See Kathleen Kingsbury, Dirty Secrets of College Waitlists, DAILY BEAST (July 14, 2017), https://www.thedailybeast.com/dirty-secrets-of-college-waitlists?ref=scroll .	Entirely
111	All Documents Concerning Vanderbilt’s statement that it “reserve[s] the right” or reserved the right to consider financial need of Applicants on its Waitlist and for Transfer Applicants.	Entirely
113	All Documents Concerning the Yale Daily News article published on February 16, 2005 entitled “Legacies Still Maintain an Edge in Admissions.” Hillary August, Legacies Still Maintain Edge in Admissions, YALE DAILY NEWS (Feb. 16, 2005), https://yaledailynews.com/blog/2005/02/16/legacies-still-maintain-edge-in-admissions/ . This Request includes all Documents Concerning the “A-list,” “B-list,” or “C-list,” mentioned in the article, or any similar lists, including copies of such lists, the identities of all Applicants or their family members on such lists, and whether any Applicant connected to any such list was ultimately accepted, rejected, or Waitlisted.	Entirely

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RFP No.	RFP Text	Entirely/Partially Obviated by Withdrawal of 568 Exemption Defense
116	All Documents Concerning the contents of the November 2, 2018 article in the Yale Daily News entitled “Development Office Courts ‘VIP’ High Schoolers, Children of Potential Donors” or the article itself. Lorenzo Arvanitis & Skakel McCooey, Development Office Courts “VIP” High Schoolers, Children of Potential Donors, YALE DAILY NEWS (Nov. 2, 2018), https://yaledailynews.com/blog/2018/11/02/development-office-courts-vip-high-schoolers-children-of-potential-donors/ .	Entirely
117	All Documents Concerning foreign national Applicants such as those identified in the March 26, 2022 Air Mail article entitled “Yale for Sale.” See Clara Molot, Yale for Sale, AIR MAIL (Mar. 26, 2022), https://airmail.news/issues/2022-3-26/yale-for-sale .	Entirely
118	All Documents Concerning Michael Lynton or the Lynton family.	Entirely
119	All Documents Concerning Your definition of the term “need-blind” as used and defined in Section 568 of the Improving America’s Schools Act of 1994 (15 U.S.C. 1 note).	Entirely
120	All Documents Concerning the 568 Group’s definition of “need-blind” as used and defined in Section 568 of the Improving America’s Schools Act of 1994 (15 U.S.C. 1 note).	Entirely
121	Documents sufficient to show that, for each year as a 568 Group Member, You did not consider the Financial Circumstances of Waitlisted or Transfer Applicants in making Admissions decisions.	Entirely
122	All Documents Concerning whether to publicly state that Your institution admits all domestic Students on a “need-blind” basis (however You define it).	Entirely
123	All Documents Concerning Your definition of the terms “need aware” and “need sensitive.”	Entirely
124	All Documents Concerning different or preferential treatment in the Admissions process for Applicants whose families are capable of making substantial Donations and Applicants who do not need Financial Aid at Your institution or that of any 568 Group Member or Peer Institution.	Entirely
125	All Documents Concerning any employees in Your Institution formally or informally involved in coordinating between the Admissions Office and Development Office or in encouraging the application and enrollment of Applicants not requiring Financial Aid, including Documents sufficient to identify all such individuals by their names and titles.	Entirely

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RFP No.	RFP Text	Entirely/Partially Obviated by Withdrawal of 568 Exemption Defense
126	All Documents Concerning any communications between Your Admissions Office staff and Your Development Office staff Concerning any Donor or Applicant, including any email correspondence and any shared electronic data or information sources.	Entirely
127	All Documents Concerning communications between (a) Your Admissions Office and the Development Office, (b) the President’s Office and the Admissions Office, and/or (c) the Financial Aid Office and Admissions Office, including any email correspondence and any shared electronic data or information sources, that identify Applicants by name and discuss the Applicants’ candidacy prior to Your issuing a formal decision on their Admissions application.	Entirely
128	All Documents Concerning communications between or among You (including but not limited to any employee in the Development Office, Financial Aid Office, Admissions Office, Alumni Relations Office, or President’s office) and any natural person(s) or families, or representatives of such natural person(s) whom You identified as part of a family who has ever cumulatively donated \$50,000 or more to You (on either a one-time or annual basis in that amount or higher) Concerning any Applicants, Admitted Applicants, current Students, or former Students of You.	Entirely
129	All Documents reflecting communications between or among You (including but not limited to any employee in the Development Office, Financial Aid Office, Admissions Office, Alumni Relations Office, or President’s office) and any natural person(s) whom You have identified as part of a family Your institution has identified as capable of cumulatively providing Donations of at least \$50,000, either on a one time or annual basis, whose children who have applied or have been admitted to Your institution.	Entirely
130	All Documents reflecting communications between or among the Office of the President, Alumni Relations Office, Development Office, or Admissions Office Concerning an Applicant’s family income, wealth, zip code, or actual or anticipated Donations to You.	Entirely
131	All Documents Concerning meetings, phone calls, or other communications other than Applicant Admissions interviews that took place or take place between or among Applicants and any of your faculty, staff, employees, or officers, including any communications by Your Development Office or Your President regarding any such meetings, phone calls, or communications other than Applicant Admissions interviews.	Entirely
132	All Documents Concerning parents or other relatives of an Applicant establishing, or potentially establishing, an endowed chair or endowed fund.	Entirely

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RFP No.	RFP Text	Entirely/Partially Obviated by Withdrawal of 568 Exemption Defense
135	All Documents Concerning the renewal of the 568 Exemption or modification of that exemption, including any advocacy Concerning such renewal.	Entirely
141	All Documents Concerning any conversations, meetings, communications, or agreements conducted pursuant to the 568 Exemption other than conversations, meetings, communications, or agreements constituting the activities of the 568 Group.	Entirely
142	All Documents Concerning any conversations, meetings, or communications between You and any other institution of higher education about efforts, individually or collectively, to persuade Congress to extend and/or modify the 568 Exemption after it is scheduled to expire on September 30, 2022. This Request includes All Documents between You and any person or entity employed as a lobbyist by you on these subjects, or between You and any Member of Congress or Congressional staff person on these subjects.	Entirely
144	All Documents Concerning Your institution’s efforts, policies, or goals to admit Students that reflect either (a) the “unique potential of applicants from less fortunate situations;” or (b) an economically diverse class.	Entirely
145	All Documents Concerning Your institution’s efforts, policies, or goals to limit the number of Admitted Applicants who need Financial Aid.	Entirely
162	All Documents produced to any government entity in connection with any investigation, litigation, or criminal prosecution Concerning Your Admissions, Financial Aid, or Development programs, procedures, policies, and practices.	Partially - As to Admissions and Development
2.1	All Documents Concerning Your study, analysis, or discussion regarding any relationship between Your admission of Legacy Admissions and Your receipt of current or future Donations.	Entirely
2.2	All Documents Concerning any scoring methodologies You have used in considering whether to admit Applicants, including but not limited to the principal factors that You have considered in Admissions; any numerical ranking or scoring system(s) used in connection with those factor(s); and any weight applied to any particular ranking or scoring of the Applicants or any particular factor.	Entirely
2.3	For all Admitted Applicants, Documents reflecting for each Academic Year the scores assigned to each factor disclosed in response to Request No. 2 and the weight, if any, applied to that factor.	Entirely

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2.4	For each Donor-related Admitted Applicant, all letters of recommendation submitted to You by a Donor, or person who refers to the Donor or donation in the recommendation, on behalf of the Applicant.	Entirely
2.6	All Documents Concerning Your search for or hiring of admissions-office personnel whose duties include or included the management of prospective Donor-related Admitted Applicants, including but not limited to the University of Chicago’s search for an Associate Director of Admissions whose duties included “[m]anag[ing] portfolio of prospective students that require special handling,” as discussed in this posting: https://www.google.com/search?q=university+of+chicago+employment+admissions&ie=UTF-8&oe=UTF-8&hl=en-us&client=safari&ibp=htl;jobs&sa=X&ved=2ahUKEwiCj4epx...	Entirely

Exhibit C.2 – Currently Proposed Search Strings Associated with Plaintiffs’ Requests for Production Obviated by Withdrawal of 568 Exemption Defense

Search String	Delete/Modify
legac* w/10 (donat* OR donor* OR development OR advancement OR fundrais* OR endow*)	Delete
(letter OR recommend*) w/10 (donor OR donat*)	Delete
(letter OR recommend*) w/10 ((friend OR family) /5 (institution OR university OR college))	Delete
admission* w/3 (position* OR liaison) AND (donor* OR donat* OR special hand* OR VIP OR (insitution* w/2 interest* OR priorit*))	Delete
"Vanderbilt" w/5 ((waitlist* OR wait*list OR transfer*) w/5 need)	Delete
[Search terms to be derived based on university relevant names in appendix 1] w/10 (donat* OR gift OR pledg*, promis* OR commit* OR beque* OR assign* OR contrib* OR give OR grant* OR confer* OR bestow* OR writ* OR endow* OR gift* OR donat* OR wealth* OR loaded OR money* OR "well*off" OR "well*to*do" OR well*heeled OR deep*pocket* OR prosper* OR mint* OR flush OR cash OR fat*cat OR "warbucks" OR "sugar daddy" OR affluen* OR heir* OR magnate OR tycoon OR baron* OR inherit* OR pennybags OR mcduck OR "rolling /3 dough" OR estate OR bankroll* OR bank*roll OR check OR wire OR donor*)	Delete
(prospect* OR student* OR candidat* OR applican* OR admiss*) w/5 (wealth* OR affluen* OR income* OR asset* OR "zip code" OR donat* OR pledg* OR rich OR endow* OR (appl* w/3 "finan* aid")) AND (President OR "Alumni Relation*" OR Development)	Delete
(hook OR tag) w/15 (development OR donat* OR donor OR pledg* OR fundrais* OR finan* OR promis* OR commit* OR beque* OR assign* OR contrib* OR give OR grant* OR confer* OR bestow* OR writ* OR endow* OR gift*)	Delete
((dean* OR president*) w/3 list) OR "interest list" OR "z list" OR "priority list" OR "VIP applic*") AND (admit* or admiss* OR appli* OR apply*)	Delete

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Search String	Delete/Modify
((prospect* OR student* OR candidat* OR applican* OR admiss*) w/5 (wealth* OR affluen* OR income* OR asset* OR "zip code" OR donat* OR pledg* OR rich* OR endow*)) AND (President OR "Alumni Relation*" OR Development)	Delete
((prospect* OR student* OR candidat* OR applican* OR admiss*) W/5 ((dean* interest* OR development* OR Z) W/2 list)) AND (President* OR Development*)	Delete
(admiss* OR "finan* aid") w/5 (polic* OR practic* OR procedure* OR protocol* OR handbook OR manual OR program* OR approach* OR plan* OR system* OR guide* OR strateg*) w/5 (non*tradition* OR continu* OR gap*)	Modify by deleting portion of search in red
("need*aware" OR "need*sensitive" OR "need*blind") w/20 (School of General Studies OR Oxford College OR School of Liberal and Professional Studies OR Resumed Undergraduate Education OR Continuing Studies OR Bachelor’s Completion Program OR Eli Whitney Students Program)	Delete
landscape w/3 (software OR program OR dashboard OR "college board")	Delete
EM	Delete
Enrollment Manag*	Delete
landscape w/3 (candidat* OR applic* OR prospect*)	Delete
enrollment management OR EM OR enroll* mgmt	Delete
Bontrager OR Hossler	Delete
Strategic Enrollment Management	Delete
"missing middle" OR "barbell effect" OR "middle income" OR "middle class"	Delete
admi* w/5 ("need*base*" OR needy* OR "need* aware" OR "need* conscious" OR "fin* circumstance*")	Delete
(need* w/1 blind) OR (need*blind*) OR (blind* w/2 need*)	Delete

Exhibit C.2 – Currently Proposed Search Strings Associated with Plaintiffs’ Requests for Production Obviated by Withdrawal of 568 Exemption Defense

Search String	Delete/Modify
Larson AND ("VIP dinner*" OR "culture of privilege")	Delete
https://www.providencejournal.com/story/news/education/2019/02/24/vip-dinners-offer-peek-at-culture-of-privilege-at-brown-university/5834510007	Delete
(Christina W/2 Paxson) AND preferential treatment [after 4/8/2019]	Delete
https://www.columbiaspectator.com/news/2017/04/20/at-a-crossroads-the-future-of-gs	Delete
Spitz AND Spectator AND "General Studies"	Delete
Eli Lee AND Spectator AND "General Studies"	Delete
https://www.columbiaspectator.com/news/2017/11/14/public-health-professor-lisa-rosen-metsch-appointed-dean-of-general-studies	Delete
https://www.sfchronicle.com/bayarea/article/In-the-college-admissions-game-even-the-legal-13683518.php	Delete
Laskaris AND ("ultra-rich" OR "fundraising mode" OR donat* OR donor*)	Delete
Dartblog AND development* AND (admission* OR "special process")	Delete
Jeff* w/1 Sassorossi	Delete
Jean Scott AND ("special attention" w/10 "prospective donors")	Delete
Brodhead AND (naïve OR "family* ability")	Delete
Golden AND "Price of Admission"	Delete
https://today.duke.edu/2006/09/admit.html	Delete
Mock AND ((develop* OR early) /3 admi*)	Delete
https://news.emory.edu/stories/2013/01/er_financial_aid/campus.html	Delete
(Emory OR Oxford) AND "need*sensitiv*"	Delete
Deacon AND (("development potential" w/1 candidat*) OR "Bill Gates")	Delete
https://www.washingtonian.com/2007/10/01/getting-in-to-top-schools	Delete

Exhibit C.2 – Currently Proposed Search Strings Associated with Plaintiffs’ Requests for Production Obviated by Withdrawal of 568 Exemption Defense

Search String	Delete/Modify
https://dailynorthwestern.com/2019/04/24/campus/northwestern-president-schapiro-says-he-reads-applications-of-some-legacy-donor-students	Delete
Schapiro AND ((read* w/10 applicat*) w/10 (legac* OR donor*))	Delete
Bishop AND "big donors" AND "special interest")	Delete
https://www.propublica.org/article/jared-kushner-isnt-alone-universities-give-rich-applicants-a-leg-up	Delete
"Mundy" AND develop*	Delete
(Crowley AND (wait*list OR waitlist*) AND ("full*pay*"))	Delete
https://www.thedailybeast.com/dirty-secrets-of-college-waitlists?ref=scroll	Delete
Vanderbilt AND (wait*list OR waitlist*) AND (right w/10 consider* w/3 financ*)	Delete
https://yaledailynews.com/blog/2005/02/16/legacies-still-maintain-edge-in-admissions	Delete
Yale AND (legac* W/10 ((A W/2 list) OR (B W/2 list) OR (C W/2 list)))	Delete
development /10 ("A-list" OR "A list")	Delete
development /10 ("B-list" OR "B list")	Delete
https://yaledailynews.com/blog/2018/11/02/development-office-courts-vip-high-schoolers-children-of-potential-donors	Delete
Yale AND (VIP w/5 high school*)	Delete
https://airmail.news/issues/2022-3-26/yale-for-sale	Delete
(oligarch* OR billionaire OR Russian) w/10 (prospect* OR student* OR candidat* OR applican* OR admiss*)	Delete
Michael W/2 Lynton	Delete
(need* w/1 aware) OR (need*aware*) OR (Aware* w/2 need*)	Delete
(need* w/1 sensitive) OR (need*sensitive) OR (sensistive* w/2 need*)	Delete

Exhibit C.2 – Currently Proposed Search Strings Associated with Plaintiffs’ Requests for Production Obviated by Withdrawal of 568 Exemption Defense

Search String	Delete/Modify
(prospect* OR student* OR candidat* OR applican* OR admiss* OR mother OR father OR family OR parent* OR grandfather OR grandmother OR aunt OR uncle OR sibling OR brother OR sister OR cousing OR partner*) w/5 ((endow* OR donat* OR develop* OR pledg* OR development case OR development adm* OR promis* OR commit* OR beque* OR assign* OR contrib* OR give OR grant* OR confer* OR bestow* OR writ* OR gift*) w/5 (large OR big OR substantial OR million* OR wealth* OR loaded OR money* OR "well*off" OR "well*to*do", well*heeled OR deep*pocket* OR prosper* OR mint* OR flush OR cash, fat*cat OR "warbucks" OR "sugar daddy" OR affluen* OR heir* OR magnate OR tycoon OR baron* OR inherit* OR pennybags OR mcduck, "rolling /3 dough" OR estate, bankroll* OR bank*roll OR check OR wire OR donor*))	Delete
NOTE: across admissions custodians ONLY "University Development and Alumni Relations"	Delete
((prospect* OR student* OR candidat* OR applica* OR admiss* OR apply*) w/5 (decis* OR status)) AND (Development* OR President* OR "finan* aid" OR Chancellor OR Advancement OR Alumni Affairs OR Alumni Relations)	Delete
(parent* OR mother OR father OR relative OR family OR uncle OR aunt OR grandfather OR sister OR brother OR cousin OR partner*) w/10 ("endowed chair" OR "endowed fund")	Delete
((Finan* w/2 (aid* OR packag* OR award* OR grant* OR loan* OR endow* OR pool* OR fund* OR budget* OR spend*) OR finaids OR FA)) w/5 (limit* OR decreas* OR reduc* OR low*)	Delete

Exhibit C.2 – Currently Proposed Search Strings Associated with Plaintiffs’ Requests for Production Obviated by Withdrawal of 568 Exemption Defense

Search String	Delete/Modify
("Common App*" OR QuestBridge OR QB OR Coalition OR Posse* OR FAFSA OR "SAR" OR "student aid report" OR CSS OR (application w/5 (admis* OR aid))) w/5 (polic* OR practic* OR procedure* OR protocol* OR handbook OR manual OR guide*)	Modify by deleting portion of search in red
((admiss* OR "finan* aid") w/5 (waitlist OR wait*list OR transfer OR "regular decision" OR "early decision" OR "early action")) w/5 (polic* OR practic* OR procedure* OR protocol* OR handbook OR manual OR program* OR approach* OR plan* OR system* OR guide* OR strateg*)	Delete
("need*aware" OR "need*sens*" OR "need*blind") /10 (transfer* OR waitlist* OR wait*list OR “waiting list” OR School of General Studies OR Oxford College OR School of Liberal and Professional Studies OR Resumed Undergraduate Education OR Continuing Studies OR Bachelor’s Completion Program OR Eli Whitney Students Program)	Delete
(need*aware OR need*conscious) w/5 ("wait*list*" OR waitlist* OR transfer* OR non*tradition*)	Delete
lobby* w/10 (568 OR (anti* w/1 exemption))	Delete
(Finan* W/2 (aid* OR package* OR award OR grant* OR loan* OR endow* OR pool* OR fund*)) W/10 (early admiss* OR early action* OR early decision* OR early applic*)	Delete
((prospect* OR student* OR candidat* OR applican* OR admiss* OR mother OR father OR family OR parent*) W/5 (endow* OR donat* OR develop* OR pledg*)) AND Development	Delete
need w/2 sensitiv*	Delete